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*Attorneys for Toyota Motor North America, Inc.,
Toyota Motor Sales, U.S.A., Inc. and Toyota
Motor Engineering & Manufacturing
North America, Inc.*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

IN RE: TOYOTA MOTOR CORP.
UNINTENDED ACCELERATION
MARKETING, SALES PRACTICES, AND
PRODUCTS LIABILITY
LITIGATION

Case No. 8:10ML2151 JVS (FMOx)

This document relates to:
*Lavergne Short et al. v. Toyota Motor
Corporation, et al.,*
Case No. 8:11-cv-00415-JVS-FMO

AFFIDAVIT OF MARK N. BODIN

STATE OF LOUISIANA
PARISH OF ORLEANS

Personally appeared before me, the undersigned officer, duly authorized to administer oaths, Mark N. Bodin, who, after being sworn, deposes and testifies as follows:

1.

My name is Mark N. Bodin, and I am of legal age and am competent to give this sworn testimony. I represent defendants Toyota Motor North America, Inc., Toyota Motor Sales, U.S.A., Inc. and Toyota Motor Engineering & Manufacturing North America, Inc. (collectively

“Defendants”) in this lawsuit. The facts stated herein are known by me to be true based on my personal knowledge, and are being provided in support of Defendants’ Motion to Dismiss.

2.

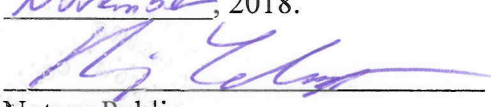
None of the plaintiffs has complied with the Court’s Order Granting Defendants’ Motion to Compel [Doc. No. 58]. Specifically, none of the plaintiffs has (1) advised Defendants in writing within 10 days (i.e., by October 29, 2018) of three dates on which she could be deposed (said dates to be no sooner than 40 days and not later than 60 days from the date of the Order), or (2) responded in any way to Defendants’ interrogatories and requests for production within 20 days (i.e., by November 6, 2018).

3.

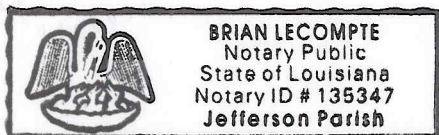
The only communication received from any of the plaintiffs since the Court’s October 17 Order was from Ms. Short. On October 31, 2018, Defendants’ counsel received a copy of the May 4, 2018 letter from plaintiffs to the Court [filed into the record on May 16, 2018 – Doc. No. 51], with a handwritten note at the top stating “Again, please respect and honor our request. Thank you.” See Exhibit 1 hereto.


MARK N. BODIN

Sworn to and subscribed
before me, this 6th day of
November, 2018.


Notary Public

at death
My Commission Expires



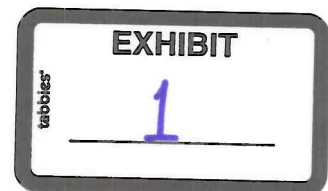
May 7, 2018

You Amos et al

10/20/18
Again, please respect and
honor our requests.
Thank you

We saw no need to put our lives at risk since Fred Smith confirmed they had everything needed from us to complete the ISL. During this time we were put in a very stressful and dangerous situation. Our pressures and heart rates became extremely elevated putting our health dangerously at risk. We cannot and will not go through this anymore. The years have passed (over 8 to be exact). Our ages have gone up and our health have diminished. Even the memory is no longer the same.

Everything requested of us have been complied with. (Fred Smith and even a voice message to a Mr. Bush earlier this year). Age, health issues and the traumatic details of that horrific accident are our enemies of life. Whatever time we have left please let it be with our families and not to spend around a bargaining table. This fear is a reality. Please leave us to have PEACE.



Finally, we have attached our signatures
for you to complete the accepted
process. Whatever you have on the
table our signatures are attached.

Mrs. Berrodine H. Carter
11/17/1937
Age 81 years old

Elizabeth Hart
3/7/48
Age 70 years old

Louise H. Hart
12/20/49
69 years old